

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE

IN RE: DEWAYNE ANTHONY REED,

Debtor(s),

**CASE NO. 20-24997-K
ADV. NO.
CHAPTER 13**

DEWAYNE ANTHONY REED,

Plaintiff(s),

v.

BRIDGECREST CREDIT,

Defendant(s).

**PLAINTIFF'S COMPLAINT TO COMPEL TURNOVER OF 2011 VW CC FROM
BRIDGECREST CREDIT**

Plaintiff, the above-named chapter 13 debtor(s), alleges and requests as follows:

1. That this is an adversary proceeding brought pursuant to FED. R. BANKR. P. 7001(1) and 11 U.S.C. § 542(a) to recover a certain 2011 VW CC assertedly repossessed by the defendant, Bridgecrest Credit., prior the commencement of this chapter 13 case.
2. That this Court has jurisdiction under the provision of 28 U.S. C. § § 1334, 151 and 157(a).
3. That by virtue of 28 U.S. C. § 157(b)(2)(E) this is a core proceeding. See also FED. R. BANK. P. 7008 (a).
4. That under the particular facts and circumstances and applicable law the plaintiff is entitled to possession of the above-described property of the estate for "use" as contemplated in 11 U.S. C. § 363.

WHEREFORE, Plaintiff respectfully prays for an expedited hearing and order directing turnover of the above-described property of the estate from the defendant-creditor.

/s/Earnest E. Fiveash

Earnest E. Fiveash
2600 Poplar Avenue, Ste. 214
Memphis, TN 38112
(901) 417-8356

CERTIFICATE OF SERVICE

On October 28, 2020, a copy of the foregoing was served via United States Mail (First Class) or electronically to the **Debtor(s)**, 905 Pawnee Ave., Memphis, TN 38109; **Bridgecrest Credit**, P.O. Box 29018, Phoenix, AZ 85038; and to **Case Trustee**, 5350 Poplar Ave. Ste. 500, Memphis, TN 38119.

/s/Earnest E. Fiveash

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